

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LAUREN A. CORK

Plaintiff,

v.

LOUIS DEJOY, *et al.*

Defendant(s).

*

*

*

*

*

*

*

*

*

Civil No.

MOTION FOR ENLARGEMENT OF TIME

Defendants, by and through counsel, Erek L. Barron, United States Attorney for the District of Maryland, and Sarah A. Marquardt, Assistant United States Attorney for said District, respectfully moves for an extension of time within which to respond to Plaintiff's Complaint and for cause state as follows:

1. On or about October 17, 2022, Plaintiff Lauren Cork filed this lawsuit against the Federal Defendants alleging negligence and discrimination. The United States filed a Notice of Removal on December 22, 2022. *See* ECF No. 1.
2. An answer or other response would normally be due within seven (7) days of the filing of removal papers. Federal Rule of Civil Procedure 81(c)(2)(C).
3. Undersigned counsel has not yet had an opportunity to investigate this case or to obtain a litigation report from USPS. Accordingly, Defendants are unable to meet the seven-day deadline, set by Fed. R. Civ. P. 81(c)(2)(C), to respond to the complaint. Undersigned counsel requests that the Court grant a 60-day extension of time through and including March 22, 2023 to respond to the Complaint. This extension will allow the government to obtain the necessary files

from the Agency, review the same, and assess the appropriate response to the multi-facet allegations in this case.

WHEREFORE, the Federal Defendants respectfully requests an enlargement of time through and including March 22, 2023 within which to file a responsive pleading.

Respectfully submitted,

Erek L. Barron
United States Attorney

By: _____/s/_____
Sarah A. Marquardt
Assistant United States Attorney
36 South Charles Street
Fourth Floor
Baltimore, Maryland 21201
Tel: 410-209-4800
Fax: 410-962-2310
sarah.marquardt@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of December, 2022, a copy of the foregoing *Motion for Enlargement of Time* was sent, first class mail, postage prepaid, to:

Laura Cork
3100 McMahon Rd #3132
Wheaton, MD 20902
L.Cork0413@gmail.com

Pro se Plaintiff

_____/s/_____
Sarah Marquardt
Assistant United States Attorney